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UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN THE MATTER OF: : CHAPTER 13  
VICTOR L. WILSON, : CASE #15-12517/AMC  
Debtor. : Hearing Date: 8/18/2020 @ 11 am

**NOTICE OF MOTION SEEKING ORDER AVOIDING LIENS  
OF  
CITADEL FEDERAL CREDIT UNION**

TO: Parties on Attached Service List

ROBERT N. BRAVERMAN with McDowell Law, PC, attorneys for the above captioned debtor, has filed a Motion to Avoid the Liens of Citadel Federal Credit Union.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

1. If you do not want the Court to grant the relief sought in the Motion or if you want the Court to consider your views on the Motion, then on or before seven (7) days prior to the date of the hearing, you and your attorney must do the following:

(a) File an answer explaining your position at:

US Bankruptcy Court  
900 Market Street, Suite 400  
Phila., PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) Mail a copy to the movant's attorney:

Robert N. Braverman, Esquire (ID 38312)  
McDOWELL LAW, PC  
46 West Main Street  
Maple Shade, NJ 08052  
Telephone (856) 482-5544  
Telecopier (856) 482-5511  
Attorneys for Debtor

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.

3. **A hearing on the Motion is scheduled to be held before the Honorable Ashely M. Chan, USBJ on August 18, 2020 @ 11:00 am in Courtroom #4, US Bankruptcy Court, 900 Market Street, Philadelphia, PA, 19107.**

4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's Office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an Answer.

McDOWELL LAW, PC  
Attorneys for Debtor,

DATED: July 20, 2020

By: /s/ Robert N. Braverman  
ROBERT N. BRAVERMAN, ESQUIRE

SERVICE LIST –

Citadel Federal Credit Union  
Attn: Anand Solanski, CFO  
520 Eagleview Blvd.  
Exton, PA 19341

Citadel Federal Credit Union  
Naomi R. McFarlin, Collections Paralegal  
520 Eagleview Blvd.  
Exton, PA 19341

Citadel Federal Credit Union  
40 N. Bailey Road  
Thorndale, PA 19372-1026

Delaware County Government Center  
Attn: Patricia Oreskovich, Director  
201 West Front Street  
Media, PA 19063

William C. Miller, Chapter 13 Trustee  
PO Box 1229  
Phila., PA 19105

Jack K. Miller, Esquire  
The Bourse Bldg., Suite 583  
111 S. Independence Mall East  
Phila., PA 19106